

THE LAW OFFICE *of* CHRISTOPHER Q. DAVIS

**WORKING SOLUTIONS NYC**

December 2, 2019

**VIA ECF**

The Honorable Paul G. Gardephe  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: *Zhou et al v. Sizung, Inc. et al*; Case No. 1:19-cv-10503-PGG**

Dear Judge Gardephe:

We represent Plaintiffs in the above referenced matter. We write, pursuant to the Clerk of the Court's referral of the Plaintiffs' Notice of Voluntary Dismissal, without prejudice to refile, to Your Honor for approval. *See* Dkt. No. 15; *see also* Dkt. Entry dated Nov. 27, 2019. Last week our Firm confirmed that Defendants no longer have operations in the United States when our retained process server attempted service at the only known business address and was credibly informed that the owners had moved out of the country and no longer conducted any business operations in the United States. Plaintiff's counsel independently confirmed this fact through other sources. Further, Plaintiffs' counsel has not been able to locate any other US based business addresses and recent social media postings have confirmed that the owners have relocated to Japan. Other privileged and nonpublic facts were learned during the course of our recent due diligence that influenced our decision to seek dismissal.

As such, Plaintiffs' counsel has provided Plaintiffs with electronic copies of their case file pursuant to our ethical obligations and advised them of all relevant statutes of limitations. Plaintiffs' counsel will not seek any fees and will not assert a lien on the matter.

Based on the above reasoning, Plaintiffs' counsel respectfully request that the Court enter the Notice of Voluntary Dismissal, without prejudice to refile, to allow the Plaintiffs to evaluate their litigation positions and if they so choose, to obtain new counsel.

We thank the Court for its prompt consideration of this matter.

Respectfully submitted,

/s/

Christopher Q. Davis, Esq.

80 BROAD ST, SUITE 703 NEW YORK, NY 10004

646-430-7930 | WORKINGSOLUTIONSNYC.COM